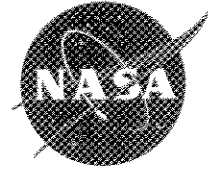


National Aeronautics and Space Administration
Headquarters
Washington, DC 20546-0001



May 12, 2010

Reply to Attn of: General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at a Federation of Galaxy Explorers' Galaxy Ball Dinner and Awards Reception on June 5, 2010

On June 5, 2010, the Federation of Galaxy Explorers', a non-profit organization under 501(c)(3) of the Internal Revenue Code and co-sponsors, Raytheon, IAI, American Military University, TASC, Northrop Grumman, Launchspace, Arianespace, Analytical Graphics, Inc., R2, Boeing, Lockheed Martin, Elon Musk, SAIC, Booze Allen Hamilton and Aerospace, will host a dinner and awards reception at the Arlington Westin Gateway Hotel, in Arlington, VA, from 6:30 p.m.-11:00 p.m. This event is to honor the hard-working volunteers and leaders in both the private and public aerospace industries.

This event will be a widely attended gathering of over 200 people, some of whom are involved in NASA projects. Attendees will include Government, civic, business, and academic leaders. The estimated cost of the dinner and reception, which includes all food and beverages, is \$120.00 per person.

I find that this event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g). I further determine that there is an Agency interest in NASA personnel attending the event. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge, may only attend if they reimburse the sponsors the cost of event for themselves and any accompanying guest. However, NASA employees whose duties may substantially affect the event sponsors such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a) which provides that employees may accept gifts valued at no more than \$20 per occasion and no more than \$50 from one source in a calendar year. NASA invitees should not accept any gift items distributed at the reception which exceed these caps.

A handwritten signature in dark ink, appearing to read "Adam F. Greenstone".
Adam F. Greenstone